

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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DWIGHT MONROE, on behalf of himself
individually and all others similarly
situated consumers,

07 CV 3630

Plaintiff,

ANSWER TO
COMPLAINT

- against -

TOTAL CREDIT RECOVERY USA GROUP, INC.,

Defendant.

Judge Berman

- - - - -X

Defendant, TOTAL CREDIT RECOVERY USA GROUP, INC., by its attorney Arthur Sanders, as and for its answer to the complaint of plaintiff, alleges as follows:

1. Defendant denies knowledge or information sufficient to form a belief as to the truth of the allegation contained in Paragraph "1" of the complaint.

2. Defendant denies knowledge or information sufficient to form a belief as to the truth of the allegation contained in Paragraph "2" of the complaint.

3. Defendant admits the allegation contained in Paragraph "3" of the complaint.

4. Defendant admits the allegation contained in Paragraph "4" of the complaint.

5. Defendant denies knowledge or information sufficient

to form a belief with respect to the truth of the allegation contained in Paragraph "5" of the complaint.

6. Defendant admits sending correspondence to plaintiff but otherwise denies knowledge or information sufficient to form a belief with respect to the allegation contained in Paragraph "6" of the complaint.

7. Defendant admits the allegation contained in Paragraph "7" of the complaint.

8. Defendant admits the allegation contained in Paragraph "8" of the complaint.

9. Defendant denies the allegation contained in Paragraph "9" of the complaint.

10. Defendant denies the allegation contained in Paragraph "10" of the complaint.

11. Defendant denies knowledge or information sufficient to form a belief with respect to the truth of the allegation contained in Paragraph "11" of the complaint.

12. Defendant denies the allegation contained in Paragraph "12" of the complaint.

13. Defendant denies the allegation contained in Paragraph "13" of the complaint.

14. Defendant denies the allegation contained in Paragraph "14" of the complaint.

15. Defendant denies knowledge or information sufficient to

form a belief with respect to the truth of the allegation contained in Paragraph "15" of the complaint.

16. Defendant denies knowledge or information sufficient to form a belief with respect to the truth of the allegation contained in Paragraph "16" of the complaint.

17. Defendant denies the allegation contained in Paragraph "17" of the complaint.

18. Defendant denies knowledge or information sufficient to form a belief with respect to the truth of the allegation contained in Paragraph "18" of the complaint.

19. Defendant denies the allegation contained in Paragraph "19" of the complaint.

20. Defendant denies the allegation contained in Paragraph "20" of the complaint.

21. Defendant denies the allegation contained in Paragraph "21 of the complaint.

22. Defendant denies the allegation contained in Paragraph "22" of the complaint.

23. Defendant denies the allegation contained in Paragraph "23" of the complaint.

24. Defendant denies the allegation contained in Paragraph "24" of the complaint.

25. Defendant denies the allegation contained in Paragraph "25" of the complaint.

WHEREFORE, defendant, TOTAL CREDIT RECOVERY USA GROUP, INC., requests Judgment dismissing the complaint with prejudice and denying all requested relief therein, together with such other and further relief as the Court deems just and proper, including costs and reasonable attorneys' fees.

Dated: Spring Valley, New York
June 7, 2007

/S/
ARTHUR SANDERS, ESQ. (AS-1210)
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TO: NOVLETTE R. KIDD, ESQ. (NK-2552)
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